



In the matter of:

**In re: Christopher E. Knight
(Debtor)**

Case No.: 24-22327-RMB (Chapter 7)

Markos Ramirez

vs.

Christopher E. Knight

Case No.: 24-02105-RMB

Witness: Markos Ramirez

Date: March 12, 2025

Court Reporter: Sheryl Stawski, RPR

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UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF WISCONSIN

In re: CHRISTOPHER E. KNIGHT,
Debtor

CASE NO.: 24-22327-RMB
(Chapter 7)

MARKOS RAMIREZ,

Plaintiff,

-vs-

ADVERSARY

CASE NO.: 24-02105-RMB

CHRISTOPHER E. KNIGHT,

Defendant.

Examination of MARKOS JESUS RAMIREZ,
taken at the instance of the Defendant, under and
pursuant to the Federal Rules of Civil Procedure,
pursuant to Notice of Deposition, before SHERYL L.
STAWSKI, a Registered Professional Reporter and
Notary Public, in and for the State of Wisconsin,
via Zoom videoconference on the 12th day of March,
2025, commencing at 1:00 p.m. and concluding at 2:15
p.m.

A P P E A R A N C E S

MALLERY S.C., by
 MR. ANDREW H. ROBINSON
 731 North Jackson Street, Suite 900
 Milwaukee, Wisconsin, 53202
 Appeared on behalf of the Plaintiff.

KERKMAN & DUNN, by
 MR. EVAN P. SCHMIT
 839 North Jefferson Street, Suite 400
 Milwaukee, Wisconsin, 53202
 Appeared on behalf of the Defendant.

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TRANSCRIPT OF PROCEEDINGS

MARKOS JESUS RAMIREZ, called as a witness herein, having been first duly sworn on oath, was examined and testified as follows:

EXAMINATION

BY MR. SCHMIT:

Q Mr. Ramirez, if you could please state your full name for the record.

A Markos Jesus Ramirez.

Q All right. And, Mr. Ramirez, have you ever been deposed before?

A No.

Q All right. Well, it's important that as you go through this process we don't talk over each other. All right?

A (Witness nods head.)

Q And you're nodding your head yes, which leads me to another thing. Whenever I ask you a question, I'm going to need you to make a verbal response.

A Understood.

Q Thank you. It's especially important here on Zoom that we're not talking over each other since it's hard to -- for her to capture everything. These are the ground rules.

1 I'm going to be asking you questions.

2 If you answer a question, I'm going to assume
3 you understood it; is that fair?

4 A That's fair.

5 Q Another way of saying it, if you don't
6 understand a question, feel free to tell me that
7 you do not understand it. All right?

8 A Understood.

9 Q Okay. Also, there's going to be an opportunity
10 after I ask a question for your counsel,
11 Attorney Robinson, to interject with an
12 objection; that's so he can make his record and
13 preserve any objections he might have for a
14 later hearing before the court, so give him time
15 to do that.

16 Unless you're instructed not to
17 answer the question, I would ask that you answer
18 the question. Okay?

19 A Understood.

20 Q All right. Why don't we start with a little
21 background. I understand you live in Arizona,
22 correct?

23 A That is correct.

24 Q All right. Can you provide me with your
25 address?

1 A 23121 North 98th -- that's 9-8 -- Drive in
2 Peoria, Arizona, 85383.

3 Q All right. How long have you lived in Arizona?

4 A Since 2020. We came out here in July of 2020.

5 Q Before that?

6 A In this residence -- since October is when we
7 moved in.

8 Q Before moving to Arizona, where did you live?

9 A I lived in Elm Grove, Wisconsin.

10 Q How long had you resided in Elm Grove,
11 Wisconsin?

12 A I believe we purchased the property in 2016 and
13 rehabbed it and moved in in what would have been
14 the spring of 2017.

15 Q So can you explain that for me? You said you
16 purchased a property in Elm Grove in 2016,
17 rehabbed it; and then you -- I assume you mean
18 you and your family occupied it sometime in
19 2017, correct?

20 A That's correct.

21 Q All right. Then you lived there for a period of
22 20 years -- excuse me, three years -- until
23 2020?

24 A Three years. 2020, yes, sir.

25 Q See, there will be times like this where it

1 wouldn't make sense.

2 Can you tell me, sir, what's your
3 educational background?

4 A I have an undergraduate degree from Marquette
5 University in secondary education and theology
6 with political science and history minors.

7 I have a master's in education from
8 the University of Massachusetts at Amherst. I
9 was a school teacher for years and then
10 transitioned into construction work.

11 Since 2010 I was self-employed doing
12 construction work, and for about six years
13 worked at the City of Milwaukee as an inspector
14 and a fire inspector.

15 Q Okay. We'll go through some of that a little
16 bit. You kind of jumped ahead of my outline
17 here just on education. That's okay.

18 So you said you went to Marquette.
19 Are you from Wisconsin, or are you a native --

20 A I'm originally from Miami. I like to say that I
21 cry for the Dolphins, and I root for the Pack.

22 I lived 30 years in Wisconsin. So
23 ten years in Florida, 30 years in Wisconsin; and
24 then, yeah, went to Marquette University High
25 School on a scholarship and work grant and went

1 to Marquette University as well on a
2 scholarship.

3 Q Well, I went to Marquette for law school. We
4 had a few guys there who did Marquette High
5 School, Marquette undergrad and then Marquette
6 Law School. I can't remember what they were
7 called. They had some little club.

8 A (Laughter).

9 Q So you said you've been self-employed since 2010
10 doing construction. Can you explain to me what
11 you do in construction?

12 A Yeah, I was a licensed -- well, I started as a
13 laborer when I was about 15 years old and then
14 kind of worked my way through the ranks doing --
15 up to management with construction companies;
16 and then in 2010 I started my own company as
17 well as working with some partners -- my best
18 friend. We did remodeling. So kitchens,
19 bathrooms, roofs, windows, doors, top to bottom
20 residential remodeling.

21 Then I transitioned after a couple of
22 years to purchasing and rehabbing properties; so
23 rental properties in the city of Milwaukee. We
24 purchased them. I would rehab them. I would
25 manage them myself, manage repairs, things of

1 that nature; and that was what I did. So it was
2 a combination of contract work and then my own
3 real estate dealings.

4 And then in approximately 2014, I
5 believe, I transitioned -- to be honest, I got
6 tired of working with customers; and I focused
7 on my own work; so that's when I started doing
8 flips and holding rental properties.

9 Q Okay. And you started the company -- your own
10 company, what was the name of the company?

11 A M&M Property Management.

12 Q And you said you started it with your best
13 friend. Who?

14 A No, that was independent. So I have two folds.
15 I had that one for holding my real estate and
16 doing those jobs. And then with the partners,
17 with two other partners we had CNR Construction,
18 which was also a Wisconsin limited liability
19 company that was a general contractor that was
20 licensed in the state of Wisconsin.

21 Q When you say "CNR" --

22 A Well, my best friends, Joe Nicholas and Paul
23 Coulter. The letter acronyms are our last
24 names: Coulter, Nicholas, Ramirez.

25 Q So it was around 2014 that you started, you

1 said, flipping properties; is that correct?

2 A Yeah.

3 Q And by flipping properties, you're saying you're
4 purchasing them and rehabbing them and sometimes
5 managing or selling or --

6 A Selling. For those it was kind of a dual thing.
7 The cheaper properties I was purchasing myself.
8 The more lucrative properties were being
9 purchased with the ultimate goal of listing them
10 for sale.

11 Some of them did get held for a
12 certain period of time, you know. I would wait
13 for the market to, you know, come back up if it
14 needed to; but the ultimate goal on those flips
15 was to purchase, rehab and sell.

16 Q I can't remember 2014. I started practicing in
17 2009 right after the housing crisis, so things
18 were crazy. Trying to remember things in 2014.
19 Was it still good rates back then?

20 A Yeah, it was pretty normalized; and at that
21 point I've always worked with my own capital --

22 Q Okay.

23 A -- and my own personal line of credit. I have
24 not taken commercial loans. I did take one
25 building loan in Florida because I started

1 building spec houses in Florida in 2018; but,
2 otherwise, I work with my own funds.

3 Q 2014, when you started with those properties,
4 through 2021, how many properties in total,
5 ballpark number -- doesn't need to be exact --
6 had you purchased yourself, financed and either
7 rehabbed or -- and held or rehabbed and flipped?

8 A Properties that I held was 11 units. I think it
9 was seven buildings. And properties that were
10 just strictly flips, I think around seven.

11 You know, that's something I could
12 look up. I was looking at my past tax records;
13 but off the top of my head, I think about seven.

14 Q And, I'm sorry, the properties that you
15 personally were purchasing and flipping or
16 holding, that was through the -- what was the
17 name of the company? D&M?

18 A M&M, like the candy.

19 Q I'm surprised that name wasn't already
20 registered.

21 A There was some variations of that name. Mine,
22 in particular, there was -- M&M Property
23 Management was available.

24 Q Okay. And now that you're in Arizona, what are
25 you doing?

1 A Currently, I work as a safety manager working at
2 data center construction sites for Microsoft. I
3 actually just got my CHST certification this
4 weekend; so I've kind of been working my way
5 into that field since getting to Arizona, which
6 I really -- works with my background as an
7 educator and as inspector to try to keep people
8 safe.

9 Q And you live there with your family, correct?

10 A Yep, with my wife and two kids.

11 Q And what's your wife's name?

12 A Margaret Mary Veronica Campbell Ramirez.

13 Q Does she go by Margaret or Maggie --

14 A She goes by Meg. She gets upset if we call her
15 Maggie.

16 Q My Aunt Margaret, she goes by Maggie; and what
17 would be a second cousin, she goes by Meg, so,
18 anyways, some background.

19 We're here on this adversary
20 proceeding that you filed in Mr. Knight's
21 individual bankruptcy case.

22 Can you tell me, how did you first
23 meet Chris Knight?

24 A Yeah, I met Chris Knight at one of my flip
25 homes, which was in Cudahy, Wisconsin. The

1 gentleman who I purchased that home from and was
2 my listing agent advised me to use Chris as my
3 stager.

4 And so I met Chris by having him
5 stage that property for sale, and then I ended
6 up using him to stage another property that I
7 had in Milwaukee on 70th Street.

8 And that was where our relationship
9 kind of shifted a little bit. I was having
10 difficulties with a contractor, and Chris
11 volunteered himself to help wrap up that
12 project; and that kind of started our
13 relationship.

14 Ultimately, I ended up having Chris
15 become my property manager for properties that
16 we were -- that I was purchasing and then ones
17 that we were purchasing together; and that kind
18 of developed over a -- you know, I'd say two
19 year -- year-and-a-half, two-year period.

20 Q Okay. So, approximately then, when did you
21 first meet Chris as the stager in Cudahy?

22 A That's a really good question. I think 20 --
23 sometime between 2018 and 2019. I don't
24 remember exactly the date.

25 Q Okay. That's fine. And you said that developed

1 over the years or over time, excuse me. So it
2 developed over time from staging to maybe
3 helping with some of the construction,
4 improvements to actually purchasing properties
5 together, correct?

6 A Correct. He was managing properties that I was
7 purchasing individually, independently; and then
8 he was also bringing to me, to be more clear,
9 investment opportunities that he wanted me to
10 be -- basically I would put down the 10 percent
11 for receiving the hard money loan from Ben, and
12 then he would manage it. He would manage the
13 construction, manage the tenant placement, and
14 then give me a return on that investment was the
15 plan.

16 Q Okay. And, approximately, how many properties
17 did you and Mr. Knight go into business together
18 on?

19 A Four.

20 Q Four?

21 A Four, yeah.

22 Q And was that all individually, or were you doing
23 it through businesses? For example, Mr. Knight
24 has the East Town Management.

25 A Yeah, I believe he was using East Town

1 Management; and I would have been using M&M
2 Property Management or my personal name. I
3 don't remember the -- those are contracts that
4 Andrew has and that I could pull up. I'm pretty
5 sure it was East Town Management and M&M
6 Property Management, if I recall correctly.

7 Q Were you using Mallery as counsel for those
8 deals?

9 A No, I was using -- for those deals, I didn't use
10 counsel. I just -- I trusted Chris. He and I
11 had contracts that were very simple. You know,
12 I would put up 10 percent to start the deal; and
13 then in a couple of them I believe I received a
14 20-percent return, and then the last two a
15 30-percent return.

16 So that was just he and I making
17 agreements that we signed. The Lone Tree
18 property I worked with a different attorney to
19 do that contract.

20 And then that attorney had advised me
21 when I reached out to him later on when things
22 weren't going well, he had advised me of the
23 Mallery Law Firm for my actual case.

24 Q Okay. Let's talk about the Lone Tree property.
25 And I think we all understand what I mean by the

1 Lone Tree property. It's located in Elm Grove.
2 It's the subject of this proceeding.

3 So if we're all comfortable
4 proceeding with that, I'll call it the Lone Tree
5 property. All right? Good?

6 A Yeah, understood.

7 Q Okay. Can you explain to me how that
8 opportunity was presented to you?

9 A Yeah, I was actually standing right there behind
10 at the stand-up desk of mine. Chris had given
11 me a call, and he said that he had an
12 opportunity in Elm Grove.

13 He and I were both of the mindset of
14 liking Elm Grove as a good area. We both
15 purchased homes that we lived in for a few years
16 and then sold.

17 So we knew that market well. He
18 presented it as an opportunity for me, again, to
19 put down that -- 10 percent down; and that he
20 would then get a hard money loan from Ben, and
21 that he would purchase the home, rehab the home
22 and list it for sale. That's the way that it
23 was presented to me.

24 So, ultimately, I would put up
25 \$75,000; and then at the end of the project when

1 it closed and it was sold, I would receive back
2 my 75,000 plus 75,000; so a total of \$150,000,
3 which was a really -- a good deal.

4 The reason it makes sense, though, is
5 that Chris doesn't put any money up, right; so
6 that's why he explained to me why he would give
7 me that nice return as that it's limited
8 liability on his. He just had to perform. That
9 made sense to me. I had known him for a few
10 years, and I liked the idea of that -- that
11 deal.

12 Q Okay. Just so I'm clear here -- you went a
13 little fast for me. You provided \$75,000 for
14 the purchase of the Lone Tree property, correct?

15 A Yep.

16 Q And then there's a hard money lender. I can't
17 remember the initials, if it's H&L or HRL or --
18 but Ben's business provided the balance of the
19 purchase price, correct?

20 A That's correct and the budget for repair.

21 Q And Ben actually -- when you say "the budget for
22 repair," you mean he's financing them, correct?

23 A Yeah. My understanding of the loan is that I
24 was putting up the earnest money for the
25 purchase; and then I made payments for a certain

1 amount of months -- I think it was six months --
2 directly to Ben, and that Ben was providing a
3 loan that would have enough money for the
4 purchase, and I believe it was about \$100,000
5 for rehab of the home.

6 Q Okay. So none of the money that you were
7 financing was actually provided to East Town
8 Management directly. You were paying it --
9 earnest money for the purchase --

10 A Correct.

11 Q -- and the loan is directly to Ben's company,
12 correct?

13 A That's correct.

14 Q And just to be clear, the only amount obtained
15 under the Lone Tree note was the \$75,000,
16 correct?

17 A That's correct.

18 Q When this opportunity is presented to you, was
19 it a phone call first? Was there an email? How
20 did it play out?

21 A It was a phone call just to kind of see if I had
22 interest. And when I confirmed that I did have
23 interest and I wanted to see the numbers, he
24 sent me a very brief, simple email. I believe
25 that that was on February 5th of 2021.

1 I made a couple notes last night just
2 to prepare for this. They were pretty basic.
3 And that was one of the dates that stood out to
4 me, but that's when this was presented to me
5 verbally.

6 And then when he got off the phone,
7 he sent me a brief email that showed the list
8 price, the rehab price, the all-in costs, you
9 know, my money in and then potentially what it
10 was worth.

11 The resale, I believe, was 850 to
12 \$900,000 was what he and I had gauged having a
13 pretty good understanding of that market in that
14 neighborhood.

15 Q Okay.

16 A So I felt that that was pretty safe. I thought
17 there was a lot of room there. All he had to do
18 was perform.

19 Q So you're familiar with Elm Grove. Did you have
20 an opportunity to sort of investigate the Lone
21 Tree property yourself?

22 A I didn't walk through it. A lot of the
23 investigation I do for real estate after a
24 number of years of experience I do online.

25 It's very much looking at, you know,

1 what the property is worth; looking at comps
2 that are in the neighborhood; understanding the
3 square foot price for sale.

4 I had done extensive research on that
5 because I did that for my personal home in Elm
6 Grove. I purchased a home that was owned by the
7 original owner's son and was very delapidated
8 and gutted to the studs, removed the roof
9 structure and put a significant amount of
10 capital into it and had a nice return when we
11 moved out here; so I had put effort into
12 understanding it.

13 My friends and I kind of worked -- we
14 really thought Elm Grove and Whitefish Bay were
15 the two, like, gold markets in Southeastern
16 Wisconsin; and so we paid a lot of attention to
17 it, viewed a lot of homes.

18 Q What about Shorewood?

19 A Yeah, Shorewood is nice. My best friend lives
20 in Shorewood. I've had a lot of sodas and
21 cookies in Shorewood, but Whitefish Bay -- for
22 some reason Whitefish Bay, man, it bangs. A lot
23 of people love that area.

24 Q Let me follow up. Relative to Lone Tree, what
25 was the condition of the property in early

1 February when you were presenting with this
2 opportunity from Chris?

3 A You know, like I said, I didn't do an extensive
4 investigation. I was at a distance, so I just
5 looked at some photos. I really trusted Chris,
6 and it just sounded like it needed upkeep, you
7 know, the yard, the pool, outside, inside.

8 Do some remodeling, you know,
9 kitchen, bathroom spruce-up, which, you know --
10 like I said, Chris and I have both done for our
11 own homes. I know he owned a home a few blocks
12 away from me in that area, too, which he did a
13 really nice job. Actually, it was a house that
14 I wanted when it was for sale.

15 So I felt -- it seemed cosmetic.
16 There did turn out to be some foundation issues;
17 but, again, that was addressed or at least
18 supposedly addressed. I did not inspect that
19 upon completion, but it seemed like cosmetic,
20 you know, get it fixed up until that discovery
21 was made in the basement; but even that wasn't
22 any sort of major concern.

23 Q Do you remember any of the circumstances as to
24 why the property was being sold or how it was
25 being sold?

1 A I don't recall if it was a foreclosure or a
2 short sale or something like that, or estate.
3 It might have been an estate.

4 I do remember that it seemed like
5 Chris really needed for me to make a decision
6 quickly, which I was comfortable with because I
7 understand that market; so it might have -- if
8 I -- I think it might have been an estate that
9 he dealt with to manage that sale price and get
10 that deal closed.

11 Q Speaking of closing, you're talking in early
12 February, correct?

13 A Of 2021, yeah.

14 Q 2021. Do you recall when the sale was able to
15 close?

16 A To purchase the property?

17 Q Correct.

18 A Relatively close after that because I just
19 remember -- if we reference that email -- I can
20 pull it up if you want -- Chris mentioned that
21 that earnest money needed to be in, like, that
22 following week; so it was relatively quick. I
23 would guess the next 30 days to 60 days that
24 deal was closed, I think.

25 Q Okay. Well, let's see if I can ask you to -- do

1 you recall when you executed the mortgage and
2 the note for the mortgage, was that at closing?

3 A I don't recall to be honest. I don't recall.

4 Q Okay.

5 A I can probably pull some emails that I had with
6 that attorney and try to, like, you know, line
7 it up. Off the top of my head, I don't recall
8 how that lined up.

9 Q Well, here's what I'd ask in that regard. If
10 you have any emails related to that, I would ask
11 that you provide them to Attorney Robinson so
12 that he can supplement the document production
13 in the case. Okay?

14 A Yeah, he should have all that.

15 MR. SCHMIT: Okay. So let's take a
16 look then at a document I'm sure you're familiar
17 with. It's what I'll Exhibit 1. And I can
18 provide these to you, Sheryl, afterwards.

19 (Exhibit No. 1 was marked.)

20 BY MR. SCHMIT:

21 Q Are you able to see what is on my screen?

22 A Yes.

23 Q Now, I'll scroll down. It's ten pages. Are you
24 familiar with this document? Go to the bottom,
25 and you'll see Attorney Robinson's signature.

1 A Yes.

2 Q I'll represent this is a complaint that was
3 filed in this case.

4 A Okay.

5 Q There's a couple allegations -- well, several
6 that I want to review with you just so I
7 understand.

8 At one point there's an allegation
9 that the debtor represented to Ramirez that the
10 loan would be used to fund a down payment on a
11 residential property, the Lone Tree property.

12 Do you dispute whether the loan
13 proceeds were used for the down payment on Lone
14 Tree?

15 A No.

16 Q Okay. Do you agree that to the extent it was
17 represented that the down payment or the
18 proceeds would be used for a down payment, they
19 were, in fact, used for that?

20 A Correct.

21 Q There's another line here. It states that
22 debtor also represented to Ramirez that he --
23 that he and East Town would not occupy the flip
24 property.

25 Can you explain to me, when did Mr.

1 Knight represent that neither he nor East Town
2 would occupy the flip -- the Lone Tree property?

3 A Yeah, at the initial conversation that we had
4 the plan was to list it for sale, and that's how
5 I would get repaid.

6 Q And so you're saying he expressly said to you on
7 the phone, we'll list it for sale; I'm not going
8 to occupy this property at any point?

9 A The conversation that he and I had was not in
10 relation to anyone moving in because that was
11 never part of the deal. The conversation that
12 we had was about it being listed for sale and
13 the marketability of it.

14 Q Well, you referenced earlier that he followed up
15 with an e-mail -- Mr. Knight did -- after your
16 phone call, correct?

17 A Correct.

18 Q That email outlines the deal points, correct?

19 A Correct.

20 Q If I scroll down on the complaint here -- I just
21 want to make sure. There's an insert here in
22 the box that you purchased Elm Grove
23 February 5th, 2021. Is that the email that
24 you're referencing?

25 A Yes.

1 Q Can you tell me, is there anywhere in this email
2 communication where Mr. Knight represents that
3 he will not occupy the Lone Tree property?

4 A Like I said, that wasn't part of the
5 conversation.

6 Q Right.

7 A What he represented here, that I see, was that
8 he showed the value of the resale, which would
9 be 850 to 900,000.

10 Q Well -- and maybe you can show me where because
11 I don't see anywhere where it says the resale
12 value.

13 A Purchased -- I'll just read it off. Line item,
14 the first one, purchase price 370, improvements
15 100, ARV 850 to 900K.

16 Q Okay. And what are you saying that the "ARV"
17 means?

18 A That's the estimated value of the home to sell.

19 Q Now, you said "estimated value" to sell.

20 We're talking about a split, and
21 earlier you were testifying about Mr. Knight
22 having purchased a property, improved it and
23 then occupied it, correct -- prior to Lone Tree?

24 MR. ROBINSON: Objection;
25 mischaracterization of prior testimony. Go

1 ahead and answer, if you can, Markos.

2 THE WITNESS: That was his personal
3 home. That's where I went and met him. That's
4 where we would meet and talk.

5 BY MR. SCHMIT:

6 Q I'm sorry, Mr. Ramirez, did I mischaracterize
7 your prior testimony, or is that accurate?

8 MR. ROBINSON: Objection; form of the
9 question. Go ahead and answer, if you can,
10 Markos.

11 THE WITNESS: I can't. I don't
12 understand the question.

13 BY MR. SCHMIT:

14 Q Sure. I want to know if I actually --
15 accurately described how you testified about
16 Mr. Knight previously purchasing a property,
17 repairing it and then occupying it, correct?

18 A Correct.

19 MR. ROBINSON: Objection; it's the
20 form of the question, Evan. It's whether that
21 constitutes a flip property or constitutes some
22 other form of investment in real estate.

23 MR. SCHMIT: Andy, I didn't ask
24 anything about a flip property. What I asked
25 Mr. Ramirez about, was he familiar with and

1 understood that Mr. Knight had previously
2 purchased a property, improved it and then
3 occupied it, correct?

4 MR. ROBINSON: I think the initial --
5 the initial question had a reference to whether
6 that was a flip. I understand where you're
7 going. That's why I'm saying, Markos, if you
8 can answer, go ahead and answer.

9 THE WITNESS: Can you repeat the
10 question, please?

11 MR. SCHMIT: Sure. Let's just back
12 up.

13 BY MR. SCHMIT:

14 Q When we started our testimony, I was asking you
15 about where you lived in Wisconsin. You
16 mentioned that in 2016 you yourself had
17 purchased a property, repaired it and then lived
18 in it, correct?

19 A Yep. That was our personal home until we moved
20 to Arizona.

21 Q In fact, you had talked about that as being a
22 house that you then sold presumably for more
23 than you purchased it, correct?

24 A That's correct.

25 Q And that you are also familiar with Mr. Knight

1 through, in part, him previously purchasing a
2 property in Elm Grove, repairing it and then
3 selling it, correct?

4 A No. Living in it. That was his house.

5 Q Oh, living in it and then later he sold it?

6 A I didn't find out that until this all kind of
7 went south.

8 Q Okay. Is that the property he was occupying
9 prior to Lone Tree?

10 A Yeah, that's my understanding. I don't know his
11 personal stakes at that point; but the home that
12 I met him at, right, that we would meet, and I
13 would bring checks, and we would talk, was a
14 home that I wanted to buy as an investment.

15 So, you know, he and I just kind of
16 both thought that was quirky, and -- but that
17 was his personal home. I remember him and his
18 wife fixing it up, made it a really nice home;
19 and that was where he lived. He and I lived
20 just a couple blocks away from each other.

21 Q Going back to your email -- or the email from
22 Chris on February 5th, 2021, just so I'm clear,
23 this email summarizing the deal points, does it
24 state anywhere that Mr. Knight is going to flip
25 the property by selling it?

1 A That was a conversation that he and I had had
2 verbally, then the email followed up. To me,
3 the email was to kind of put the numbers in
4 front of me based on the conversation he and I
5 had.

6 The conversation was this is an
7 investment property to sell. You'll get your
8 money back when the property sells. Initially
9 we thought about ideally listing it the
10 following spring. That was -- that was the
11 conversation he and I had.

12 Q Okay. So when did you -- when did you first
13 learn that Mr. Knight and you had this
14 disagreement on what it means to flip a property
15 if he's intending to refinance and obtain the
16 property himself?

17 A I mean, that's not a -- I wouldn't say it's a
18 disagreement. The first time that Chris
19 presented that to me was when my family did a
20 road trip back to Wisconsin in the summer of
21 '22.

22 And he and I had walked the property
23 at that point just to kind of see where it was
24 at and what was left. Clearly, it was way
25 behind schedule at that point.

1 And if I recall, when we met in
2 person, we didn't discuss it. I believe he
3 called me maybe a couple weeks later in August
4 and asked me -- and pardon my French -- the
5 question he asked me was how do you feel about
6 me being the buyer for the property.

7 And my exact response was, I don't
8 fucking care who buys it, you know. I didn't --
9 I didn't think that -- doesn't matter to me. I
10 don't care who buys the house. I do real estate
11 investments. It's not personal. I want it on
12 the market. I want it sold. If somebody else
13 wants to buy it off market, be my guest.

14 Q So if it's a flip for a sale or a flip to a
15 refinance to Mr. Knight personally, you don't
16 really care, correct?

17 A Yeah, as long as it closes and I get my money,
18 no.

19 (Exhibit No. 2 was marked.)

20 BY MR. SCHMIT:

21 Q Okay. Let's jump ahead a little bit. I'm going
22 to show you what I have marked as Exhibit 2.
23 Can you identify what these documents are for
24 me?

25 A I believe this is the agreement that I had the

1 attorney write up for us to do this deal.

2 Q So page 1 it says, "Mortgage," and then it
3 continues for four pages -- or five pages, and
4 then you get to the mortgage note, correct?

5 A Correct.

6 Q And I'm going to point out that the mortgage
7 note is dated October 13th, 2021 as well as the
8 mortgage itself being signed October 13th, 2021.

9 A Okay.

10 Q Do you see that?

11 A Yep.

12 Q To the extent this was executed at closing, it
13 would appear that -- at any rate, the note and
14 the mortgage itself were in October --

15 A Correct.

16 Q -- about eight months after the first
17 discussion, correct?

18 A Correct.

19 Q All right. I'm on page 4 of this document, and
20 it says, "This instrument drafted by" -- it
21 looks like Attorney Ajay --

22 A Kuttemperoor.

23 Q Okay. Is that the attorney you had prepare
24 these documents?

25 A That's correct.

1 Q Was Attorney Kuttemperoor at Mallery at that
2 time?

3 A No. He was an independent attorney. As far as
4 I knew, he was an attorney that was referred to
5 me by my best friend Daniel Liquin (phonetic).
6 He had done some deal with him, and he knows
7 more about, you know -- I don't want handshake
8 deals. I've done -- a lot of work I do on my
9 own.

10 And so I reached out to Dan because I
11 knew that this was something that I should have
12 a legal document for. And so it was referenced.
13 I reached out, and I'm pretty sure that he had
14 his own practice at that point.

15 He worked somewhere else. When I
16 reached out to him when this was going south, he
17 advised me to reach out to Mallery. I believe
18 he was still independent at that point. Now he
19 works for someone, but I don't know who it is.

20 MR. ROBINSON: He's with our firm.
21 He started in January of 2024 here, Evan.

22 THE WITNESS: I didn't know that.
23 BY MR. SCHMIT:

24 Q It all makes sense to me. I was just trying to
25 figure out if he went from real estate to

1 litigation.

2 Markos, are there any other documents
3 related to the one that you're familiar with?

4 A No.

5 Q Okay. So there's no loan agreement related to
6 the note, correct?

7 A Correct.

8 Q So there wouldn't be a business purpose
9 affidavit attesting that this loan is solely for
10 business purposes, correct?

11 A This is the only document that I'm aware of.

12 Q Okay. The mortgage and the mortgage note,
13 correct?

14 A That's correct.

15 Q I'm going to go back to Exhibit 1. You had an
16 appraisal prepared of the Lone Tree property,
17 correct?

18 A There was an appraisal of the Lone Tree property
19 that was done, I believe, last year just to
20 ascertain the status of the property.

21 Q All right. I'm going to scroll to paragraph 24
22 of your complaint. It states that "On June 13,
23 2024, Ramirez obtained an appraisal of the Flip
24 Property from Whitehouse Appraisals."

25 That is consistent with what you were

1 saying; there was an appraisal prepared in 2024,
2 right?

3 A Correct.

4 Q All right. It noted that -- there's a comment
5 here about several issues with this Lone Tree
6 property.

7 Bullet point 2, it states, "The
8 basement appears to have been flooded from
9 improper sump pump drainage. The drywall has
10 been damaged, and the finished area of the
11 basement needs to be rebuilt."

12 Do you see that line?

13 A Yes.

14 Q Do you recall learning of any flooding at the
15 Lone Tree property?

16 A I knew that there had been some water in the
17 basement. Like I referenced earlier, there was
18 some discovery of a basement issue.

19 Q I'm wondering if there was a flooding event that
20 you recall occurring after the purchase of the
21 Lone Tree property.

22 A I mean, it says it right there that there was
23 damage; but I do believe that I had spoken to
24 Chris about that. He had to cut out some
25 drywall or something.

1 Q Okay. I guess my question for you then is: Did
2 it occur after the closing, or was it damaged
3 that you're aware of prior to closing?

4 A No, it would have been during the construction
5 phase. I think I'm freezing up here.

6 Q I can hear you, but -- you're not moving or
7 you're playing a very good game of sitting
8 still.

9 A I am not that still. The video is frozen, but I
10 can hear you.

11 Q And, obviously, Chris doesn't control that the
12 basement would flood, does he?

13 A I don't know how to answer that. Basements
14 flood in Wisconsin. It happens. If you have
15 appropriate construction, and you have
16 appropriate drain tile and you have appropriate
17 sump pumps operating the way they should, they
18 can be mitigated, but it happens.

19 Q If he's buying the property from an estate
20 sale -- let's make that assumption -- how was he
21 supposed to know ahead of time that the property
22 would flood in September of 2022?

23 A I don't understand what the -- why that's even
24 pertinent. I didn't say that.

25 Q Well, I'm asking you if you'd agree that Chris

1 wouldn't be able to know ahead of time buying a
2 property in October of 2021 that it is going to
3 flood at a later date.

4 A I don't believe that any human on the planet is
5 responsible for weather.

6 Q Okay. During this case --

7 A Actually, I'm sorry, can I -- I do have
8 something I'd like to add to that statement, if
9 that's okay.

10 Q If you've got more, you can say it.

11 A My home, my personal home at 955 Brinsmere Drive
12 in Elm Grove, couple of crocks. I had to do
13 rehab for it. When the springtime is coming,
14 you know there's going to be a thaw. You know
15 there's going to be water. The priorities are
16 to mitigate that and have that in place.

17 I can remember some pretty big storms
18 that came through Elm Grove, and I made sure my
19 sump pumps were operational and I can mitigate
20 that water that would come in, which is
21 inevitable. It enters your drain tile, it goes
22 to your crock and it gets pumped out.

23 That's not a mystery. It happens
24 every year in Wisconsin, right. That's home
25 maintenance. That's rehab. That's

1 construction. You manage your project.

2 I've had multiple flips in Wisconsin.
3 They start in the winter and open up in the
4 spring, and that was just always a priority for
5 me, like, that's just managing your project.

6 Q Okay. And Chris --

7 A Excuse me?

8 Q Anything further? I want to make sure you've
9 had a chance to finish your --

10 A I feel that if -- the person managing that
11 construction, that's their responsibility.

12 (Exhibit Nos. 3 and 4 were marked.)

13 BY MR. SCHMIT:

14 Q All right. Let's look at these responses that
15 were provided. These were the responses that I
16 received from your counsel. This will be
17 Exhibit 3 dated December 13th, 2024.

18 There's an unsigned verification as
19 to the responses, and I just want to make sure
20 because this was -- the next document, part of
21 it, the verification, this is how it was
22 received.

23 Can you confirm for me, Mr. Ramirez,
24 that this verification, Exhibit 4, is, in fact,
25 the verification for those responses, Exhibit 3?

1 Are you there?

2 MR. ROBINSON: Markos, are you there?

3 (Zoom technical difficulty.)

4 BY MR. SCHMIT:

5 Q All right, Mr. Ramirez. Welcome back. What I
6 was showing before was a copy of the plaintiff's
7 responses that were provided by your counsel,
8 and I wanted to confirm that the verification
9 that was also provided relates to those
10 responses. Can you confirm that for me?

11 A I don't understand the question.

12 Q Well, let's take a look. This is the document I
13 was provided with your signature down here. So
14 is that your signature?

15 A I can't see the document.

16 Q Okay. You're running into the same problems I
17 had when I got it. Let me see --

18 MR. ROBINSON: You're not sharing
19 your screen, Evan.

20 MR. SCHMIT: Okay. Super. Now,
21 let's go through it. All right.

22 BY MR. SCHMIT:

23 Q Now can you see this document, Mr. Ramirez?

24 A Yes.

25 Q Is that your signature?

1 A That is my signature.

2 Q Okay. And it says, as to responses, and it's
3 dated the 9th of December 2024; and you can see
4 here, it says, above that, "As to objections,"
5 with your counsel's electronic signature, but no
6 date.

7 Now, I want to confirm this
8 verification pertains to the responses that were
9 produced by your counsel with a date of
10 December 13th. Can you confirm that for me?

11 A Andrew, you created that document, correct? Can
12 you confirm that?

13 MR. ROBINSON: I can confirm that the
14 document we are viewing now is what was provided
15 to me from Mr. Ramirez.

16 BY MR. SCHMIT:

17 Q All right. I don't know how I'm supposed to
18 take that.

19 Mr. Ramirez, did you furnish this
20 verification to your counsel for use in your
21 responses to the defendant's discovery?

22 A Yes.

23 Q Okay. Sometimes what happens is we, as counsel,
24 provide drafts; and when it's time to get a
25 signature or we get an old draft or something,

1 and it doesn't always work out; but I just want
2 to make sure I wasn't going to run into any
3 issues where this verification isn't intended
4 for the responses that were received. I think
5 we covered that, correct?

6 A Yes.

7 Q Earlier you said you thought that the loan you
8 provided covered about six months of mortgage
9 payments, correct?

10 A Yeah, payments to Ben Savik (phonetic) on his
11 hard money loan, yeah.

12 Q Okay. Do you know when those payments -- did
13 East Town Management or Chris continue making
14 payments to Ben?

15 A I don't have any verification, but that was my
16 understanding. The way that the deal was
17 presented to me was that I would put up the
18 earnest money, the closing money and then make
19 certain amount of payments to reach the dollar
20 amount that's referenced in my mortgage, and
21 then I was good; I was done at that point.

22 All I needed to do at that point was
23 wait for the project to complete. And so my
24 understanding was that, yeah, that was Chris's
25 responsibility. Whether or not those were paid,

1 I don't know.

2 Q Do you know approximately when Mr. Knight
3 occupied the Lone Tree property?

4 A I mean, yeah, my understanding would have been
5 sometime at the end of 2022. I don't know when
6 that happened.

7 I know when he first broached it with
8 me would have -- I believe would have been
9 August. I did not receive any -- and that was
10 to purchase the property. He never spoke to me
11 about moving into the property. It just was
12 mentioned to me, and then I understood it; so I
13 found out after the fact.

14 Q And do you recall approximately when after the
15 fact you learned that Mr. Knight was occupying
16 the Lone Tree property?

17 A I think, like, October, November of 2022;
18 somewhere in there.

19 Q Do you dispute that Chris or East Town
20 Management made renovations to the Lone Tree
21 property?

22 A No.

23 Q And do you dispute that those renovations were
24 made with the intention of flipping the
25 property?

1 A No, that was my understanding. It was to
2 rehabilitate the property, to flip it, list it
3 for sale.

4 Q And there's a response here to Interrogatory
5 No. 5. I'm going to scroll to that for you.

6 Interrogatory 5 asked you to
7 "Identify any Documents in support of
8 Plaintiff's allegation in paragraph 9 of the
9 Complaint that had he known the Defendant 'told
10 the truth to [Plaintiff] that he would utilize
11 [Plaintiff]'s loan to purchase the Flip Property
12 in order to make it his personal residence,
13 [Plaintiff] would never have made the loan.'"

14 And the response: "All documents
15 provided illustrate that the Defendant presented
16 the Flip Property as a short-term business
17 investment and not a personal loan to the
18 Defendant to pay for the Defendant's personal
19 lifestyle. See, emails and the terms of the
20 Note."

21 Can I ask, Mr. Ramirez, what do you
22 mean in your response pay for the defendant's
23 personal lifestyle?

24 A Andy?

25 MR. ROBINSON: The question is not to

1 me, Mr. Ramirez. You have to --

2 THE WITNESS: Okay.

3 MR. ROBINSON: -- answer.

4 THE WITNESS: Okay. My view of that
5 is this was an investment property. This was
6 not Chris's personal home.

7 This was a property to purchase,
8 rehabilitate, list on the market as quickly as
9 possible and get the best offer that we can so
10 that I can be repaid, Ben could be repaid and
11 Chris can profit. That was my understanding.

12 BY MR. SCHMIT:

13 Q All right. And the money, again that you
14 provided, went directly to Ben for his first
15 mortgage, correct?

16 A A portion of it, yeah.

17 Q And to the extent it was a six-month period,
18 closed in October, we've got maybe sometime in
19 April, you're saying you became aware of or
20 learned that Mr. Knight had occupied the
21 property sometime in -- I think it was October,
22 November of '22 you were saying?

23 A Yes.

24 Q Let's assume that's when he occupied it. Prior
25 to occupying the property, he would have had a

1 personal residence, correct?

2 A Yes.

3 Q Different than the Lone Tree property, right?

4 A Correct. That's the one I referenced earlier.

5 Q So how if he has a personal residence that he's
6 occupying, presumably paying for, how are you
7 funding anything to do with this personal
8 lifestyle by making the mortgage payments to
9 Ben?

10 A Ben moved into the house and became a squatter.

11 Q You mean Chris moved into the house?

12 A Yeah, yeah. My apologies. I misspoke on that.
13 Chris Knight moved into the property and made it
14 his personal home. That was never a part of the
15 deal.

16 Q Right. And over that one-year period from the
17 closing -- actually, let's just expand it
18 because it was eight months to -- 20 months
19 between February of 2021 when he approached you
20 and later in 2022 when he's occupying the
21 property, there's changes in circumstances that
22 occurred, correct?

23 A That is what? What circumstances changed?

24 Q Well, let's talk what you said earlier. You
25 didn't know about the foundation issues at the

1 time the property was purchased, correct?

2 A That is correct.

3 Q You didn't know the property was going to flood
4 after it was purchased, correct?

5 A Correct.

6 Q There's also the fact that the closing -- I
7 mean, we talked about a purchase in February.
8 The closing doesn't occur until October,
9 correct?

10 A Correct.

11 Q And I understand that you're talking about a
12 six-month purchasing price, but isn't it true
13 that really from the get-go Mr. Knight had
14 always been discussing it as a 12-month window?

15 A I would not argue that. That is correct, sir.
16 My estimation was ideally list it in spring of
17 2022, but Chris was upfront with me that that
18 might take more time. And I was, you know -- I
19 was understanding. I do projects. I know that
20 they don't go perfect, which is why I -- I did
21 not reach out for an attorney until Chris did.
22 I was being patient. I was very patient this
23 entire time.

24 Q Twenty-seven of the complaint states, not only
25 did debtor fraudulently obtain and extend his

1 loan from Ramirez, the debtor never intended to
2 the flip the flip property. His actions also
3 indicate that he never intended to repay the
4 loan.

5 Mr. Ramirez, is it your belief that
6 Chris never intended to repay you for the loan
7 on Lone Tree?

8 A I haven't been repaid. I don't have anything
9 that would show me otherwise.

10 Q Well, I understand that you weren't repaid; but
11 what your complaint alleges -- and what I'm
12 asking is, if it's your belief that in February
13 of 2021 when Mr. Knight approached you about the
14 Lone Tree property, it was his intent never to
15 repay you on the \$75,000 investment?

16 A His actions show me that. He became a squatter
17 in the home that's our flip house and never paid
18 me any money.

19 Q Let me ask you this: You had previously done
20 business with Mr. Knight prior to the
21 February 2021 business dealing, right?

22 A Uh-huh.

23 Q Now, I assume that his actions prior to February
24 of 2021 offer on Lone Tree, everything prior to
25 that, all your business dealings would suggest

1 to you that he did intend to pay that \$75,000
2 loan; is that fair?

3 A No, that's inaccurate because he's never paid
4 any money to me. I was the customer. I was
5 paying him for services.

6 Q So maybe I'll try this again.

7 Based on your business dealings with
8 Mr. Knight up to your February of 2021 offer on
9 the Lone Tree property, did you believe he
10 intended to repay you the \$75,000 at that time?

11 A Yeah, when he and I spoke of it, I did believe
12 that. I think that was a mistake, but I did
13 believe that then.

14 Q Right. You're saying now, with the benefit of
15 time, in hindsight you don't believe he intended
16 to repay you?

17 A That's correct.

18 Q And that's based on the fact that he hasn't
19 repaid you, correct?

20 A Yeah, we had -- we had other deals he also
21 floundered on and didn't pay me. We were able
22 to come to an agreement with those, and he
23 returned my initial investments; but for two
24 years he dragged multiple deals of ours through
25 the mud and made no money.

1 I'll be really clear, too. I offered
2 to help him. I'm a good general contractor. I
3 have subcontractors. I offered to give any
4 support he needed to make those deals and Lone
5 Tree work, and he rebuffed that at every turn.

6 In retrospect, now I feel that's
7 because I was being defrauded. He didn't want
8 me involved, and that's based on all the
9 failings that have happened since February of
10 2021.

11 Q Well, in Interrogatory No. 10 on your screen you
12 were asked to identify any documents in support
13 of plaintiff's allegation that defendant
14 fraudulently obtained and extended a loan from
15 plaintiff as alleged in paragraph 27 of the
16 complaint.

17 In response to that request, you say
18 review all documents provided. Now, I can't
19 tell from that response what, if any, of these
20 documents that were provided actually are
21 intended to identify any support for paragraph
22 27 here regarding the defendant fraudulently
23 obtaining or extending the loan from the
24 plaintiff.

25 A No.

1 Q Let's review those. We go back to our mortgage
2 and mortgage note.

3 Mr. Ramirez, are you able to tell me
4 whether or not this document is responsive to
5 Interrogatory No. 10?

6 A That's the only document that I have that is for
7 the deal. It's a legal document.

8 Q Okay. And can you explain to me how that
9 evidence supports your allegations that the
10 defendant fraudulently obtained an extended loan
11 from you?

12 A I mean, I think what makes it fraudulent is his
13 admission that he planned on living in the
14 house, and he never told me that; and then he
15 moved into it.

16 Q When did he move into it?

17 A Again, I don't know when he moved into it. I
18 have some idea of when that was clear to me and
19 evident because he mentioned it which would have
20 been in late 2022.

21 Q You also produced an appraisal. Is this
22 responsive to Interrogatory 10 of the documents
23 that were provided?

24 A I mean, for me the way I look at the appraisal
25 is it shows that he did not fulfill his

1 agreement on rehabilitating the property or
2 listing it for sale.

3 Q Now, can you explain that to me? How does the
4 appraisal in 2024 indicate that the defendant
5 here fraudulently obtained and extended the loan
6 from Mr. Ramirez?

7 A It just shows the project wasn't completed. I
8 mean, he moved into the house without completing
9 the project. I mean, that's kind of odd to me
10 because it's not what we discussed. It's not
11 what our agreement was for.

12 Q That's a good point. You said you had purchased
13 a property in Elm Grove, rehabilitated it, and
14 then you occupied it, correct?

15 A That was the purpose of that. That was my
16 personal primary home that -- my wife wanted to
17 be in that neighborhood.

18 Q And you waited until the rehab was completed
19 before you occupied it, correct?

20 A Yeah. I waited for occupancy and the home to be
21 complete so we can move into it.

22 Q That's what you would expect if in the normal
23 course of order for someone who is buying a
24 home, repairing it and choosing to occupy it,
25 correct?

1 A I can't speak for what other people do. That's
2 how I handled it. My expectation is that the
3 project would be complete. It's a complete
4 home. The appraisal for me, what it shows, it's
5 not a complete home. It's not completed.

6 Q We'll look at the last of the documents that
7 were produced in discovery, and we have
8 emails -- an email dated December 2, 2021, Elm
9 Grove pics. Looks like this is from Mr. Knight
10 to you; is that correct?

11 A I believe so.

12 Q And I assume when it says Elm Grove pics, are
13 these pictures of Lone Tree that Mr. Knight was
14 providing you?

15 A I believe so.

16 Q Can you tell what's going on in that first
17 picture?

18 A It's hard to tell. It looks like just the yard
19 is kind of a mess.

20 Q We'll zoom that in a little for you. Is that
21 any better?

22 A Yeah. Not -- not really, but it looks like a
23 bunch of refuse, many things that were brought
24 out from the home that are in the yard.

25 Q What about this second picture; can you tell?

1 A This is the facade of the property with a ladder
2 up.

3 Q Do you know why Mr. Knight -- or do you have a
4 belief as to why Mr. Knight was providing you
5 with these photos?

6 A I was asking for them. I felt that I had given
7 lots of patience, and there wasn't production.

8 In my business what I do is manage,
9 and the only way that I could manage this
10 situation was by requesting phone calls. We did
11 monthly phone calls and then requesting
12 pictures, but it just became really apparent to
13 me that nothing was moving forward.

14 And so then I kept pressing for
15 updates. I wanted things to progress. I needed
16 this to get to the finish line.

17 Q Well, in December of 2021, that's only two
18 months after the closing if it closed in
19 October, correct?

20 A Uh-huh.

21 Q So were you -- were you already pressing for
22 more photos and more information in December?

23 A No, that would have been, like, a year -- that
24 would have been after August of 2022 when I was
25 feeling really pressed.

1 The initial ask is -- because it's
2 like a normal procedure. The only way for me to
3 see this process on this project would be based
4 on calls with Chris or photos.

5 Q And then --

6 A So it looks like demolition now that we're, you
7 know, hashing out this conversation. It looks
8 like it was demolition to the property to
9 prepare it for the next phase.

10 Q So from these documents it looks like things
11 are, would you agree, kind of going in the
12 normal course?

13 A Yeah. Definitely.

14 Q So going back to Interrogatory 10, these
15 documents aren't showing anything relevant to a
16 response as far as defendant fraudulently
17 obtaining or extending the loan from plaintiff,
18 correct?

19 A I'm sorry, can you repeat that?

20 Q Sure. Your response here is "Review all
21 documents." We're kind of doing that right now
22 because I don't see any of these documents that
23 really respond to this; but, in particular, it
24 would seem like photos in December of 2021
25 showing the demolition that's expected at the

1 property really don't support any allegation
2 that defendant fraudulently obtained and
3 extended the loan; is that fair?

4 A Yeah. Like I said before, what to me
5 constituted it is what his actual actions were
6 later in the process.

7 Q Well, let me just be clear here. You're talking
8 about the final result, right, that you didn't
9 get paid, correct?

10 A Well, he didn't complete the project, and he's a
11 squatter in it now.

12 Q That's it. The fact that you didn't get paid,
13 and he's occupying the property and the repairs
14 haven't been finished, correct?

15 A Correct. It's a breach of contract.

16 Q Anything else?

17 A No.

18 Q That's a --

19 A No. That's a no, sir.

20 (Exhibit No. 5 was marked.)

21 BY MR. SCHMIT:

22 Q Thank you. Then I'm scrolling on to page
23 [sic] 5, an email dated February 7th, 2021 from
24 Mr. Knight to you. It states, hello, when you
25 look at these, remember a few things; almost an

1 acre, two full baths, two half baths, 4,300 SF
2 finished, Cape Cod, lots of curb appeal and all
3 in for 600K including your profit. This is a
4 cannot lose. First money in; first money out.
5 Chris.

6 This is shortly after, I think, that
7 email that you inserted into your complaint,
8 correct?

9 A Yes.

10 Q And if I go down more, I see February 7th on
11 flexmls.com, is it fair to assume this is the
12 link to the Lone Tree property?

13 A That or it could be comps. I always asked for
14 comps.

15 Q Okay.

16 A So I'm not sure what exactly that link was.

17 Q Now, we find, on page 7, this is the email that
18 was inserted, correct --

19 A Correct.

20 Q "Lone Tree Docs. Take a look. I will call you
21 later." This ends -- and I don't know if there
22 are any docs -- but do you have any idea what
23 would have been attached, if anything was
24 attached to this email?

25 A I don't know. I mean, I don't know.

1 Q Now, I have a text. This looks like it was
2 later, December 9th, 2022, from Chris -- or, no,
3 it's an email --

4 A That an email, yeah.

5 Q -- to you saying that he's met with an attorney.

6 Is it safe to say this is at a point
7 where your relationship has deteriorated, and it
8 was beginning to fall apart?

9 A No, that was my birthday. That was the day --
10 that was supposed to be our monthly call, and he
11 hadn't called me; and so I sent a couple text
12 messages to say, hey, I'm ready -- ready for our
13 call.

14 I will preface it as well that what
15 led to this conversation -- and there's other
16 texts to support it -- was Chris mentioning that
17 he would get his refi, he would close it, he
18 would pay me; and that if he couldn't, he would
19 list it in the spring.

20 And so now fast forward approximately
21 60 days, we get to this point. I'm anticipating
22 that he and I are getting on a call to kind of
23 review where things are standing. He replies to
24 my text message saying, I sent an email, and
25 then that -- that was the email I saw.

1 That was the first time that, you
2 know, he -- I believe that I responded to his
3 email with, okay, we'll let the attorneys figure
4 it out. That's when I started to reach out to
5 Ajay and ultimately be in contact with
6 Mr. Robinson.

7 Q And then you filed suit in January of 2023,
8 correct?

9 A That sounds correct.

10 Q All right. And after you initiated the
11 foreclosure case against Mr. Knight and East
12 Town Management, it's my understanding there was
13 also some other litigation, two other lawsuits
14 that were filed; is that correct?

15 A I can recall one which would have been for the
16 South 9th property.

17 Q Well, there's one lawsuit I saw that was you and
18 Mr. Wycklendt?

19 A Oh, that would have been for -- that would have
20 been State Street, and that got settled.

21 Q And then this other litigation. So if I recall,
22 it was something like a lawsuit in January, a
23 lawsuit in April and then a lawsuit in June,
24 correct?

25 A I don't recall the dates.

1 MR. SCHMIT: Okay. We were looking
2 at the emails and texts and -- I'm sorry,
3 Sheryl, I can't keep track where we are now. I
4 think this was initially going to be my
5 Exhibit 5, but I think -- I think we might be at
6 six. I can't recall.

7 (Discussion held off the record.)

8 (Exhibit No. 6 was marked.)

9 BY MR. SCHMIT:

10 Q There's a few other text messages here.
11 November 22. Looks like you're saying to
12 Mr. Knight, at the lower portion of the text
13 message, that he stated on your call, there's no
14 way he could list the home for sale given the
15 condition of the yard and not being completed.
16 Our deal was to flip the house. Plan was to
17 list in August. I have no problem with you
18 keeping the house. I'm happy for your family to
19 be in the home, but you aren't able to get the
20 mortgage, it seems. How do we move forward. I
21 need this resolved. That's November of 2022,
22 correct?

23 A Yeah, that makes sense.

24 Q So, again, what you said earlier, you don't
25 really care if he keeps the house --

1 A No.

2 Q -- as long as you're getting paid, right?

3 A This is correct, sir.

4 Q Okay.

5 A Doesn't matter to me who purchases the property.

6 Q Now, we're moving on to our next exhibit.

7 These are documents that were
8 produced by the defendant in this case,
9 additional text messages.

10 So we've got Chris sending to you --
11 Chris in the blue, you in the gray. I'll
12 represent that, all right.

13 Now, Mr. Ramirez, if I look at page 1
14 here, on November 2, 2021 -- it's the start of
15 this text message -- and I think I can presume
16 anything before that predates November 2, 2021,
17 at least at that time, okay.

18 You're stating in that response here,
19 that gray area, that doesn't change the fact
20 that six months to refi is not accurate, and I
21 question your ability to pull these loans as you
22 said you would. I don't blame you for that, but
23 it's reality.

24 And Mr. Knight comes back to say,
25 well, I guess I can prove you wrong on that very

1 shortly. No issue refinancing; just have to
2 meet everybody's stupid guidelines. We are good
3 at the bank. You say, we will see, right?

4 A Doesn't seem like that was accurate.

5 Q Well, did I read it accurate is the first
6 question.

7 A Yeah, you read it accurately.

8 Q Okay. As it turns out, you're saying Mr. Knight
9 was not able to get that -- that refinancing
10 that he thought he would be able to get, right?

11 A Correct.

12 Q I guess here, though, based on this message, it
13 would appear as of -- at least before this
14 November 2, 2021 time, you were in discussions
15 with Mr. Knight; and he was telling you that he
16 intended to refi you out, correct?

17 A Correct.

18 Q And that would have been less than a month of
19 that -- than that October date for closing,
20 correct?

21 A Can you blow that up? It's really tiny. I
22 don't think that that's in reference to Lone
23 Tree. That's in reference to the properties
24 that we had together that he was supposed to
25 refi for us to hold.

1 Q That's what you think?

2 A Yeah, that's a totally different topic.

3 Q Okay. And then earlier -- this is page 2
4 here -- there's a discussion of a 12-month
5 period with Lone Tree.

6 This is consistent with what you were
7 saying before; that Chris was forthcoming with
8 you in saying that this is really a 12-month
9 project not a 6-month project, correct?

10 A Let me read it, or do you want to read it?

11 Q No, you can.

12 A Do you want me to read it out loud?

13 Q No.

14 A Yeah, I mean, that was us discussing from the
15 get-go; I always felt there was no reason this
16 should be a 12-month project. I like listing in
17 spring. If you understand Wisconsin real
18 estate, having a project that's ready in August
19 sucks because you're about to go into the worst
20 time of the year to sell.

21 So I was always hoping that he would
22 get on the horse, get this project ready and
23 listed in April. When that did not occur, I
24 understood. It wasn't contentious at that
25 point, you know. I understood.

1 But I always listen, and I stand by
2 my statement there; if you're going to run
3 projects, you've got to push; you've got to
4 drive; you've got to perform. That's what that
5 was.

6 Q My question was: This text message here is
7 consistent with what you testified earlier that
8 Mr. Knight was upfront with his estimate that
9 the project would take 12 months?

10 A That it could, yeah.

11 Q Page 3 is a text message exchange in February --
12 September 12, 2022. The first comment there,
13 message from Mr. Knight states, moving tomorrow,
14 3 inches of water in basement, going to be
15 Thursday. And then, that's no good. Old house
16 or new house, is your response. New, long
17 story. Explain next week.

18 Mr. Ramirez, do you know if the new
19 house that Mr. Knight is referring to was the
20 Lone Tree property?

21 A I don't know. That was vague. I can't answer
22 that.

23 Q You don't recall?

24 A I don't.

25 (Exhibit No. 7 was marked.)

1 BY MR. SCHMIT:

2 Q Our next exhibit here, Exhibit 7, I'll
3 represent, Mr. Ramirez, this is the proof of
4 claim that you filed in the East Town
5 Management, LLC Chapter 11 case. All right.
6 I'm going to scroll to page 3. That's your
7 signature, correct?

8 A Yes.

9 Q Total amount of the claim was \$160,855.25. I'm
10 going to scroll down to the support that was
11 filed with this statement.

12 Am I to understand from this
13 statement again that of the \$160,855.25, the
14 principal here, the \$75,000, represents the
15 amount that was obtained by East Town Management
16 from you for the Lone Tree property?

17 A Yes.

18 MR. SCHMIT: No further questions.

19 Andy?

20 MR. ROBINSON: Nothing from me.

21 (Proceedings concluded at 2:15 p.m.)
22
23
24
25

1 STATE OF WISCONSIN)
2) SS:
3 COUNTY OF MILWAUKEE)
4

5 I, Sheryl L. Stawski, a Registered
6 Professional Reporter and Notary Public in and for
7 the State of Wisconsin, do hereby certify that the
8 deposition of MARKOS JESUS RAMIREZ was recorded by
9 me on the 12th day of March, 2025, and reduced to
10 writing under my personal direction.

11 I further certify that I am not a
12 relative or employee or attorney or counsel of any
13 of the parties, or a relative or employee of such
14 attorney or counsel, or financially interested
15 directly or indirectly in this action.

16 In witness whereof, I have hereunder
17 set my hand and affixed my seal of office at
18 Milwaukee, Wisconsin, this 20th day of March, 2025.
19
20

21 _____
22 Notary Public
23 In and for the State of Wisconsin

24 My commission expires: September 24, 2026.
25

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